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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 PARNELL COLVIN, ) CASE NO. 2:20-cv-01765-APG-EJY  
12 )  
13 Plaintiff, ) PLAINTIFF'S PROPOSED VOIR DIRE  
14 ) QUESTIONS  
15 vs. )  
16 M.J. DEAN CONSTRUCTION, INC., )  
17 Defendant. )  
18 ) Trial: March 27, 2023  
19 ) Time: 9:00 a.m.  
19 ) Judge: Honorable Andrew Gordon  
19 )

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20 Plaintiff PARNELL COLVIN ("Plaintiff" or "Colvin") submits his proposed voir dire  
21 questions to be posed to prospective jurors at the time of jury selection as follows:

- 22 1. Do you feel it is wrong for an individual to file a lawsuit to enforce their legal  
23 rights. If so please explain.
- 24 2. Have you ever filed a lawsuit to enforce you legal rights? If so please explain.
- 25 3. What are your views when a non-African American calls an African American the  
26 N-word?

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- 1       4. Does your view change if an African American calls another African American the
- 2                    N-word? If so, why?
- 3       5. Do you feel there is any use for the n-word in today's society? If yes, please
- 4                    explain.
- 5       6. Have you ever been called a racist? If so please explain.
- 6       7. Do you think you are a racist? If so please explain.
- 7       8. Do you think former President Donald Trump is racist? If so please explain.
- 8       9. Do you think former President Donald Trump has used racist language or said
- 9                    racist things in the past? If so please explain.
- 10      10. Do you agree with any of the language that former President Donald Trump has
- 11                    used in the past as it relates to his views on different races or national origins in
- 12                    America? If so please explain.
- 13      11. What are your views of white supremacy or white supremacists in America today?
- 14      12. Do you feel white supremacy or white supremacists views are on the rise in
- 15                    America? If so please explain.
- 16      13. Do you agree with any of the views of white supremacists in America today? If so
- 17                    please explain.
- 18      14. For example do you agree with the main view of white supremacists that whites or
- 19                    Caucasians are superior to non-whites? If so please explain.
- 20      15. Are you of the opinion that employers have a duty or obligation to insure that white
- 21                    supremacists or other discriminatory views are not voiced at their workplace or are
- 22                    you of the opinion that that is something the employee just has to deal with? Please
- 23                    explain your view as needed.
- 24      16. Are you of the view whites or Caucasians are treated worse than non-whites in
- 25                    America today? If so please explain.
- 26      17. Are you of the opinion that the laws in America favor non-whites over whites or
- 27                    Caucasians? If so please explain.
- 28

1       18. Do you think there is a problem with discrimination in America today? If so please  
2           explain.

3       19. In general are you in favor of discrimination laws to combat discrimination in  
4           America? If so please explain.

5       20. Are you in favor of discrimination laws to combat discrimination in the workplace?  
6           If so please explain.

7       21. Do you feel that you have ever been subjected to discrimination in the workplace?  
8           If so please explain.

9       22. Do you feel that you have ever been subjected to a hostile work environment in any  
10           job you have held in the past? If so please explain.

11       23. Do you feel that you have ever been subjected to retaliation in the workplace? If so  
12           please explain.

13       24. What are your views about compensating an employee with non-economic  
14           damages for emotional distress, mental anguish, etc. for discrimination they have  
15           suffered in the workplace?

16       25. What are your views about compensating an employee with punitive damages to  
17           punish their employer/former employer for malicious and wrongful conduct they  
18           have suffered in the workplace?

20           DATED: 3/21/2023

21           LAW OFFICES OF MICHAEL P. BALABAN

22           BY: /s/ Michael P. Balaban  
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**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to FRCP Rule 5(b)(3) and LR IC 4-1(a), a true and correct copy of the foregoing document was electronically served via the Court's CM/ECF electronic filing system to the following persons on March 21, 2023:

Martin A. Little, Esq.  
Robert L. Rosenthal, Esq.  
HOWARD & HOWARD ATTORNEYS PLLC  
*Attorneys for Defendant*

/s/ Michael P. Balaban  
Michael P. Balaban